REMARKS

In the Office Action mailed from the United States Patent and Trademark Office on March 12, 2003, the Examiner objected to the abstract and to claim 1. Applicants respectfully submit that the objections made by the Examiner have been corrected by the amendments provided herein. Also in the Office Action, the Examiner rejected claims 1-43 under 35 U.S.C. §103(a) as being unpatentable over Lawson et al (U.S. Patent No. 5,721,825, hereinafter "Lawson") in view of Boukobza et al (U.S. Patent No. 6,122,664, hereinafter "Boukobza"). Accordingly, Applicants respectfully submit that the claim set as amended herein are not made obvious by the cited references and provide the following:

Lawson teaches a system and method for globalizing event notifications in a distributed computing environment. The current system and method can be used with virtually any underlying event notification system. In one preferred embodiment, the present invention is designed to work in conjunction with current event notification systems to achieve the desired functionality. (col. 4, lines 26-32)

Lawson presumes an underlying event notification system which: (1) allows local event consumers to register for notification of an event; and (2) sends notification of events that occur to registered local event consumers. In addition, it is desirable for some embodiments to allow registration of custom event types. If an underlying event notification system does not provide the ability to register locally for an event, does not send even notifications to locally registered event consumers, or does not allow registration of custom event types, then this functionality can be provided as part of the invention of Lawson. (col. 4, lines 32-44)

Lawson achieves global event notification by storing a global event registry comprising a list of events and a corresponding list of servers which need notification when the corresponding

event occurs. In addition to the global registry, each server stores a local event registry comprising a list of events and a corresponding list of local event consumers that need notification when an event occurs. The basic event globalization process utilized these two registries to globalize events as follows: Each server has running thereon a local event globalization process that registers for events desired by local event consumers. When an event consumer registers for an event, the event globalization process of the event consumer's local server places an entry into the local event registry for the local server. An entry is also placed into the global event registry for the local server where the event consumer is located. Thus, the global event registry is updated to contain an entry identifying the server where the event consumer is located and the desired event and the local event registry of that server is updated to identify the event consumer and the desired event. When a local event globalization process receives notification of an event that has occurred locally, the local process looks in the local registry in order to identify local event consumers that need notification of the event. This process then transfers the event to any identified local event consumers. In addition, the process checks the global event registry to identify any additional servers which also need notification of the event. This process then sends the event to the corresponding event globalization process running on the identified servers. These corresponding event globalization processes, in ram, check their local event registries and provide the event to any event consumers identified therein. In this way, local events can be routed to any event consumer in the network without the need to register at each server. (col. 4, line 45 to col. 5, line 12)

In Lawson, it is a primary object to provide systems and methods for global event notification and distribution. Another primary object is to provide systems and methods for global event notification that allow a local event consumer to receive notification of events

without registering with each individual server in the network. Another object of Lawson is to provide systems and methods for global event notification and distribution that eliminate duplicate event notifications. A further important object of Lawson is to provide systems and methods for global event notification and distributions that allow a user to register and trigger a custom event type. (col. 6, lines 16-31)

Boukobza teaches a process that makes it possible to monitor n machines, that is n nodes, N1, N2, . . . , Nn, from a management node MN. For the intercommunication to which the invention relates, the management node MN chiefly comprises a certain number of components, including the graphical user interface GUI and the configuration file CF. The interface GUI makes it possible to show, in the main window on the screen, the objects selected from the list of the objects that can be displayed, with one icon for each object having a color, for example green, orange and red, that depends on its status. Also, when an object is selected and a "zoom" is requested by means of the menu bar, a window with the name of the object is displayed, which contains all the objects which compose this object. The interface GUI also allows the display of parameter value curves, with several curves in the same graph, if desired. During the configuration of the monitoring, a list of graphs can be added to each object described, while a list of parameters to be displayed is associated with each graph. The interface GUI makes it possible to call at least one management tool for each type of object while moreover, the expertise or the stored experience of a user or a user's tool, which is a valuable aid for monitoring, can advantageously be displayed. The configuration file CF contains all of the configurations of the objects with the description of these objects, as well as all of the predefined static or dynamic parameters; it can be analyzed and dynamically modified or added to. By downloading the configuration file, for example, the autonomous agents are installed, via the

interface IWMN (of the node N1) with the management node MN, in the nodes to be monitored from the management node MN, a specific command being used to install the autonomous agent SAA, as in the FIGURE, in the node N1. Each node to be monitored has its own files SL ("scanlog") of parameters, conditions and associated actions which allow it to control its own monitoring, while the management node also holds the status files of the nodes to be monitored as well as the parameter display files (a set of "trace" files TF). The updating of the list of the nodes in which an autonomous agent is installed is done automatically by the management node. The starting and stopping of the monitoring process are controlled by the management node. A new object can easily be incorporated by the process according to the invention and monitored by an autonomous agent that has already been configured. An autonomous agent SAA is chiefly composed of a generic agent GA related to specific modules SM (SM1, SM2, . . . , SMn), each of which is specific to an object type or to a particular domain, and of files, one of which is intended to contain the basic functions BF used. (col. 4, line 36 to col. 5, line 18)

The standard for a Section 103 rejection is set for in M.P.E.P 706.02(j), which provides:

> To establish a *prima facie* case of obviousness, three basic criteria must be met. **First there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the references or combine reference teachings.** Second, there must be a reasonable expectation of success. Finally, **the prior art reference (or references when combined) must teach or suggest all the claim limitations**. The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, and not based on applicant's disclosure. *In re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991). (Emphasis added).

Applicants respectfully submit that the claim set of the present invention includes limitations that are eventcentric. And, while Lawson is eventcentric, Lawson does not disclose "identifying specific events within the list of events to be monitored for a specific purpose," as is acknowledged by the Examiner on page 3 of the Office Action. While Lawson is eventcentric,

Boukobza is in contrast objectcentric. As acknowledged by the Examiner in the Office Action beginning at the end of page 3, "During the configuration of the monitoring, the user of the management node describes the objects to be monitored ... and specifies modifications relative to the default choice of the specific modules."

Applicants respectfully submit that because Lawson is eventcentric and Boukobza is objectcentric, there is no suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the references or combine reference teachings. Accordingly, Applicants respectfully submit that the combination of Lawson and Boukobza does not establish a *prima facie* case of obviousness. Applicants further respectfully submit that even if the combination of Lawson and Boukboza did provide a suggestion or motivation to combine reference teachings, the cited references, alone or in combination, do not teach or suggest all the limitations of the present claim set and thus the combination does not establish a *prima facie* case of obviousness. Accordingly, Applicant respectfully submits that none of the claims of the claim set provided herein is either anticipated or made obvious from the references cited by the Examiner.

CONCLUSION

Applicants submit that the amendments made herein do not add new matter and that the claims are now in condition for allowance. Accordingly, Applicants request favorable reconsideration. If the Examiner has any questions or concerns regarding this communication, the Examiner is invited to call the undersigned.

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Respectfully submitted,

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